I am a resident of the state of New York, and I work as a computer
system administrator at the State University of New York at Buffalo.
I am writing to you as a private citizen; the University does not
review or endorse this e-mail.

I believe the proposed settlement to the Microsoft antitrust case does
not usefully lower the applications barrier to entry. It should
require the disclosure of file formats; it should require the
disclosure of network protocols; and it should forbid Microsoft from
prohibiting reverse engineering in license agreements.

DISCLOSURE OF PROPRIETARY FILE FORMATS

Proprietary file formats, such as the Microsoft Word .DOC format, or
the Excel .XLS format, form a powerful part of the Applications
Barrier to Entry. Since their documentation is only available from
Microsoft under Non-Disclosure Agreements, it is not possible for
third parties to write software to reliably interoperate with Word or
Excel.

You can try to write a program that will edit a .DOC file -- and many
people have -- but unless you're working from the Microsoft
documentation on the precise format of the file, you must determine
the file format through the difficult process of reverse engineering.

Microsoft should be required to disclose the file formats for its
products, especially Microsoft Office. Such disclosure should be
required seven months in advance of the release of any product which
relies on such a format.

DISCLOSURE OF NETWORK PROTOCOLS

It is not currently possible for another manufacturer to compete
directly with the Microsoft Outlook e-mail client product, nor with
the Microsoft Exchange e-mail server product, because the protocol by
which the Outlook client communicates with the Exchange server is not
disclosed.

Were the protocol disclosed, it would be possible to write alternate
client implementations for use with the Exchange server; and it would
be possible to write alternate server implementations for use with the
Outlook client.

Microsoft should be required to disclose the file formats for its products, especially Microsoft Exchange and Microsoft Outlook. Such disclosure should be required seven months in advance of the release of any product which relies on such a protocol.

PROHIBITION OF REVERSE ENGINEERING

As the Microsoft Windows product has been shown to have a monopoly share of the market for desktop operating systems, it forms such a large part of the competitive environment for any other product as to be like a force of nature. For meaningful competition to exist, it must be possible for other entities to discover as much information about Windows as is necessary for them to write a competing product; Microsoft prohibits such discovery through the use of clauses in license agreements forbidding reverse engineering.

Microsoft should be enjoined from prohibiting reverse engineering of its Operating Systems, Middleware, and Office Automation products.

Thank you for your attention to this comment.

Sincerely,

Daniel F. Boyd